

### **REMARKS**

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1, 4-7 and 10-15 are present in the application. Claims 1 and 7 are independent. By this amendment, claims 1, 4, 7 and 10 are amended. No new matter is involved.

Reconsideration of this application, as amended, is respectfully requested.

### **Personal Interview**

Applicants acknowledge with appreciation the courtesies extended by Examiner Matthew Ludwig to their representative. Mr. Robert J. Webster, Reg. No. 46,472, during the personal interview conducted on Tuesday, April 5, 2010. During that interview agreement was reached regarding amendments to claims 1 and 7 so that amended claims 1 and 7 appear to patentably define over the applied art.

A similar amendment has been made to claim 7.

### **Claim Rejections Under 35 U.S.C. § 102**

Claims 1, 4-7 and 10-15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0010573 to Wakita et al. ("Wakita"). This rejection is respectfully traversed.

Independent claim 1 recites a text generation method for generating a natural sentence from parts of the sentence, comprising: an input step using input means for inputting only parts of the sentence wherein the natural sentence is characteristic of a style or an expression, an extracting step using extracting means for extracting candidate sentence parts or phrases, which

includes an inputted part of the sentence, from a database, and a text generation step using text generation means for generating the natural sentence based on the inputted parts of the sentence and the extracted candidate sentence parts or phrases by combining the extracted candidate sentence parts or phrases, and wherein parser means morphologically analyzes and parses the extracted at least one sentence part or phrase to obtain a syntactic structure of the at least one candidate sentence part or phrase by determining the syntactic probability of the appropriateness of the order of candidate sentence parts or phrases by applying a statistical technique using a syntactic model, thereby generating a sentence having a maximum probability of being a natural sentence which is characteristic of the style or expression.

Independent claim 7 recites a text generation apparatus for generating a natural sentence, comprising: input means for inputting only parts of the sentence wherein the natural sentence is characteristic of a style or expression, extracting means for extracting candidate sentence parts or phrases, which includes an inputted part of the sentence, from a database, and text generation means for generating an optimum natural sentence based on the inputted parts of the sentence and the extracted candidate sentence parts or phrases by combining the extracted candidate sentence parts or phrases, wherein parser means morphologically analyzes and parses the extracted at least one candidate sentence part or phrase to obtain a syntactic probability of the appropriateness of the order of candidate sentence parts or phrases by determining the syntactic probability of the at least one candidate sentence part or phrase by applying a statistical technique using a syntactic model, thereby generating a sentence having a maximum probability of bring a natural sentence which is characteristic of the style or expression.

Applicants respectfully submit that the above combinations of steps and elements as set forth in independent claims 1 and 7 are not disclosed by Wakita.

As explained during the interview, inputs a complete sentence and compares parts of that sentence with parts of several predefined sentences from a database corpus, and selects one of the predefined sentences from that corpus to serve as the outputted sentence.

This is significantly different from Applicants' disclosed and claimed invention. For example, applicants start with inputted sentence parts or phrases and search a database corpus for sentence parts or phrases containing the inputted sentence parts or phrases, and combine those corpus-based sentence parts or phrases into a sentence that is outputted.

Furthermore, Wakita has no disclosure whatsoever of parser means that morphologically analyzes and parses an extracted at least one sentence part or phrase to obtain a syntactic structure of the at least one candidate sentence part or phrase by determining the syntactic probability of the appropriateness of the order of candidate sentence parts or phrases by applying a statistical technique using a syntactic model, thereby generating a sentence having a maximum probability of being a natural sentence which is characteristic of the style or expression, as claimed.

Additionally, Wakita fails to mention statistics or probability whatsoever, and only discloses selecting as a sentence most similar to an input sentence, a corpus sentence which has the largest number of key word pairs that is included in the input sentence.

**In other words, just determining which corpus sentence has the largest number of keyword pairs is not determining the syntactic probability of the appropriateness of the**

**order of candidate sentence parts or phrases by applying a statistical technique using a syntactic model, as claimed.**

**Additionally, Wakita differs from the claimed invention in that Wakita is not concerned with generating a natural sentence which is characteristic of a spoken or written style or an expression, but is concerned with translating Japanese sentences into English sentences**

Furthermore, with respect to claim 5, Wakita is totally devoid of any disclosure of performs a word insertion process starting with a word having the highest probability in the learning model, wherein the word insertion means performs the word insertion process by including, as a keyword, a word to be inserted, between the two keywords, and determining whether there is a word to be inserted between the other two keywords in all arrangements of the keywords, and by repeating the cycle of word inclusion and determination until a probability that there is no word to be inserted between any keywords becomes the highest. The assertion that this feature is disclosed in Figs. 10 to 13b fails to explain exactly what portions of those figures support this conclusion, and applicants are unable to locate such disclosure. Applicants also respectfully submit, in this regard, that the word “probability”, which is found in claim 5, never appears in Wakita.

Accordingly, the Office Action does not make out a *prima facie* case that claims 1, 4-7 and 10-15 are disclosed by Wakita, and reconsideration and withdrawal of this rejection of claims 1, 4-7 and 10-15 under 35 U.S.C. § 102 are respectfully requested.

**CONCLUSION**

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Robert J. Webster, Registration No. 46,472 at (703) 205-8000 in the Washington, D.C. area.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicants respectfully petition for a two (2) month extension of time for filing a response in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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